

plaintiffs, Jane Doe 2 and Jane Doe 3, and incorporate 52 additional paragraphs, 50 of which contain new substantive allegations against Dartmouth. *See, e.g.*, First Amended Complaint, at ¶¶ 32, 34, 43, 47, 62, 75-78; 282. Plaintiffs also incorporate novel substantive details into at least two paragraphs included in the original Complaint. *See id.* at ¶¶ 275, 281. Dartmouth's response to the First Amended Complaint is due May 15, 2019.

3. Dartmouth and its counsel require additional time to evaluate Plaintiffs' new substantive allegations, as well as the procedure by which the First Amended Complaint was filed, before responding.

4. On May 3, 2019, counsel for Dartmouth and for Plaintiffs conferred via e-mail regarding the substance of this Motion. Plaintiffs assented to Dartmouth's request for an extension of fourteen days to respond to the First Amended Complaint.

5. The granting of this Motion would not result in the continuance of any hearing, conference, or trial, nor alter any other deadline set forth in the Discovery Plan.

6. Dartmouth respectfully submits that a Memorandum of Law would not assist the Court in its decision concerning this Motion, because the issues presented are uncontested and do not involve complex or novel issues of law.

WHEREFORE, Dartmouth respectfully requests that the Court extend the deadline for Dartmouth to answer or otherwise respond to Plaintiffs' First Amended Complaint until and including May 29, 2019.

Respectfully Submitted,

TRUSTEES OF DARTMOUTH COLLEGE

By their attorneys,

/s/ Joan A. Lukey

Joan A. Lukey (N.H. Bar ID #16246)

Justin J. Wolosz (*pro hac vice*)
Lyndsey M. Kruzer (*pro hac vice*)
CHOATE HALL & STEWART LLP
Two International Place
Boston, Massachusetts 02110
Telephone: (617) 248-5000
Fax: (617) 248-4000
joan.lukey@choate.com
jwolosz@choate.com
lkruzer@choate.com

Date: May 6, 2019

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2019, I caused a true and correct copy of the foregoing Motion, filed through the ECF system, to be served electronically on all counsel of record identified on the Notice of Electronic Filing (and below) as registered participants, and that copies will be sent via first class mail to those counsel who are not registered participants on the ECF system.

Charles G. Douglas, III
DOUGLAS, LEONARD & GARVEY, P.C.
14 South Street, Suite 5
Concord, NH 03301
(Served via ECF)

David W. Sanford
Nicole E. Wiitala
SANFORD HEISLER SHARP, LLP
1350 Avenue of the Americas, 31st Floor
New York, New York 10019
(Served via ECF)

Deborah K. Marcuse
Steven J. Kelley
Austin L. Webbert
SANFORD HEISLER SHARP, LLP
111 S. Calvert Street, Suite 1950
Baltimore, MD 21202
(Served via ECF)

/s/ Joan A. Lukey_____

Joan A. Lukey